

**FACT SHEET**  
**DRAFT HAZARDOUS WASTE PERMIT**  
**PREPARED FOR**  
**COLFAX TREATING COMPANY, LLC**

**EPA ID# LAD 069 524 981**  
**Agency Interest # 97707**  
**Activity # PER20040001**

**Alexandria, Louisiana**  
**Rapides Parish**  
**Permit Number LAD 069 524 981-PC-RN-1**

**I. INTRODUCTION**

This fact sheet has been developed in accordance with the Louisiana Administrative Code (LAC) 33:V.703.D and briefly sets forth principal facts and the significant factual, legal, methodological, and policy requirements of the draft post-closure permit for the Colfax Treating Company, LLC, EPA ID Number LAD 069 524 981, located in Alexandria, Rapides Parish, Louisiana.

Colfax Treating is seeking to renew its hazardous waste post-closure permit for the Chatlin Lake Canal, and Vacuum Pump Cooling Water Pond.

The Louisiana Department of Environmental Quality (LDEQ) has prepared this proposed draft hazardous waste post-closure renewal permit for the surface impoundments which addresses the requirements of LAC Title 33, Part V, Subpart 1 and the Federal Resource Conservation and Recovery Act (RCRA) as amended by the 1984 Hazardous and Solid Waste Amendments (HSWA).

**II. THE PERMITTING PROCESS**

The purpose of this fact sheet is to initiate the permitting decision process. The LDEQ Office of Environmental Services -Waste Permits Division (OES-WPD) of the LDEQ is required to prepare this draft hazardous waste post-closure permit. It sets forth all the applicable conditions, which the OES-WPD requires the permittee to comply with during the life of the permit. Colfax Treating Company, LLC submitted its RCRA Post-Closure Permit Renewal Application on May 11, 2004.

The permitting process will afford LDEQ, interested citizens and any other agency the opportunity to evaluate the ability of the permittee to comply with the requirements of LAC 33:V.Subpart 1, and the HSWA portion.

The public is given a minimum of forty-five (45) days to review and comment on the draft hazardous waste post-closure renewal permit. The Administrative Authority, before deciding or taking any final action on the draft hazardous waste renewal permit, will consider all appropriate comments. The decision of the Administrative Authority will be to issue, deny, or modify the draft hazardous waste permit in accordance with LAC 33:V.705.

#### **A. DRAFT HAZARDOUS WASTE PERMIT**

The OES-WPD reviewed the permit application and other pertinent technical information, and prepared a draft hazardous waste permit that contains the language pertaining to post-closure care of the listed units.

This draft hazardous waste permit is a tentative determination and is not the final decision of the Administrative Authority.

#### **B. PUBLIC COMMENT PROCEDURES**

LAC 33:V.715 requires that the public be given at least forty-five (45) days to comment on a draft permit decision.

The specific dates for the opening and closing of the public comment period are contained in the public notice that was issued for this particular permitting action. Any person interested in commenting on the draft permit for the Alexandria facility must do so within the forty-five (45) day comment period.

Public notice of the proposed action shall be published in specified newspapers, announced on the designated radio station, and mailed to those persons contained on the facility's mailing list.

#### **C. LOCATIONS OF AVAILABLE INFORMATION**

The administrative record, including all supporting documents, are on file at the LDEQ Public Records Center, Room 1-127, 602 North 5th Street, Baton Rouge, Louisiana. These documents may be inspected and copied (at \$0.25 per copy page) at any time between the hours of 8:00 to 4:30 p.m., Monday through Friday (except holidays).

In addition, a copy of all supporting documents relative to this permitting action is available for review at the Rapides Parish Library, 411 Washington Street Alexandria, LA 71301-8338.

#### **D. WRITTEN COMMENT SUBMISSION**

Interested persons may submit written comments on this draft permit decision to the Administrative Authority, at the address listed below, no later than 12:30 p.m., on the closing date of the comment period.

All comments should include:

- (1) the name and address of the commentor,
- (2) a concise statement of the exact basis for any comment and supporting relevant facts upon which the comment is based,
- (3) identification of the facility commented on (the EPA Identification Number and the AI Number), and
- (4) supporting relevant facts upon which the comments are based.

All comments, requests for a public hearing, further requests for information (including copies of this decision fact sheet) and any requests by public interest groups or individuals who would like to be included in the mailing list, should be made in writing to:

Ms. Soumaya Ghosn  
Louisiana Department of Environmental Quality  
Office of Environmental Services  
Post Office Box 4313  
Baton Rouge, Louisiana 70821-4313  
(225) 219-3276 or fax (225) 219-3309

Any technical questions regarding this draft permit should be addressed to:

Ms. Toni Metoyer Booker  
Louisiana Department of Environmental Quality  
Office of Environmental Services  
Waste Permits Division  
Post Office Box 4313  
Baton Rouge, Louisiana 70821-4313  
(225) 219-0956 or fax (225) 219-3158

### **III. DESCRIPTION OF OVERALL SITE**

The Colfax Treating Company, Alexandria Plant is a former wood preserving plant located in Alexandria, Rapides Parish, Louisiana. The facility is engaged in ongoing corrective action activities to recover and remediate contaminated groundwater. Recovery wells pump contaminated groundwater to a waste recovery system where it is treated and discharged to the City of Alexandria publicly owned treatment works (POTW).

#### **IV. HAZARDOUS WASTE FACILITIES**

The Chatlin Lake Canal and Vacuum Pump Cooling Water Pond were interim status facilities which were closed in accordance with approved closure plans. All units were certified closed, and the closure approved by the Department in March, 1988. The proposed post-closure renewal permit will enable the performance of post-closure care, maintenance, and groundwater monitoring activities on the permitted units.

The Chatlin Lake Canal was placed into service in the 1960's to process wastewaters from wood treating operations. The canal is located along the southern border of the current Colfax Treating Company property, and north of the property of Railworks Wood Products, formerly Durawood.

The Vacuum Pump Cooling Water Pond was placed into service in 1974 for the purpose of processing wastewaters from wood treating operations. The Cooling Water Pond is located on the southwest portion of the current Colfax Treating Company property.

#### **V. FINANCIAL ASSURANCE FOR POST-CLOSURE AND LIABILITY REQUIREMENTS**

The applicant has provided a detailed, written estimate for annual costs of post-closure monitoring and maintenance of the facility in accordance with applicable post-closure regulations.

Colfax Treating Company maintains an irrevocable letter of credit that satisfies the requirements of LAC 33:V.3711. In addition, Colfax Treating Company must maintain a standby trust fund in accordance with the most recent post-closure cost estimate.

#### **VI. SUMMARY OF ENVIRONMENTAL FACTORS CONSIDERED**

Pursuant to La. R.S. 30:2018.E.3, this draft hazardous waste post-closure renewal permit is not subject to the requirements regarding environmental assessment statements or IT Analysis (See Save Ourselves v. Louisiana Environmental Control Commission 1152 (La. 1984)). Nevertheless the LDEQ has considered some factors similar to IT questions in preparing this draft permit. This is a preliminary analysis based on information currently available to the LDEQ.

##### **A. The potential and real adverse environmental effects of the proposed project have been avoided to the maximum extent possible.**

Colfax Treating Company has submitted its Part B Permit Renewal Application for the closed surface impoundments at the Alexandria facility, which includes the Chatlin Lake Canal and the Chatlin Lake Cooling Water Pond. These units are closed and undergoing post-closure care in accordance with State and Federal regulations. The design of the post-closure units and post-closure requirements

for the units are adequate to avoid potential and real adverse environmental impacts to the maximum extent possible.

The surface impoundments were closed by removing K001 sludge and contaminated soil to a waste recycling facility and backfilling the units with clean soil. Clean closure could not be obtained due to the presence of groundwater contamination. To address the contamination, a groundwater monitoring program for the units is a part of the post-closure care requirements. Groundwater and corrective action programs will continue during the post-closure period with provisions that allow the Administrative Authority to lengthen or shorten the post-closure care period should conditions warrant such action.

**B. A cost benefit analysis of the environmental impact balanced against the social and economic benefits of the project demonstrates that the social and economic benefits outweigh environmental impacts.**

There is no immediate environmental impact cost associated with the post-closure units addressed in this permit. The post-closure care program would mitigate any potential environmental impact. Because this permit addresses existing closed units there will be neither positive nor negative economic effects associated with this application. Since there are no environmental impact costs associated with this application, there is no need to offset such costs.

**C. There are no alternative projects or alternative sites or mitigating measures which offer more protection to the environment than the proposed project without unduly curtailing non-environmental benefits to the extent applicable.**

**1. ALTERNATIVE PROJECTS**

This draft permit renewal is for the post-closure of hazardous waste surface impoundments. The proposed permitting action includes groundwater monitoring and post-closure care requirements. There appears to be no known alternative projects that would offer more protection to the environment than issuing a post-closure permit for the closed units.

**2. ALTERNATIVE SITE**

This draft permit renewal is for an existing facility. The hazardous waste units to be permitted are post-closure units which were closed by removing K001 sludge and contaminated soil to a waste recycling facility and backfilling the units with clean soil. Clean closure for the units could not be obtained due the presence of groundwater contamination.

The location of the post-closure units was determined by the previous location of the operational units that were closed.

### **3. MITIGATING MEASURES**

Colfax Treating Company, LLC has instituted post-closure care requirements for the closed units that are protective of human health and the environment. No mitigating measures would offer more protection to the environment than permitting the existing units without unduly curtailing non-environmental benefits.

# **PUBLIC PARTICIPATION**